



Advocates for Workplace Fairness

March 24, 2023

Via ECF:

The Honorable Nelson S. Roman
United States District Judge
Southern District of New York
300 Quarrapas St.
White Plains, New York 10601-4150

Re: *Dail Moses-Taylor v. Greyston Foundation, Inc.*, Case No. 1:21-cv-06756

Dear Judge Roman:

We represent Plaintiff Dail Moses-Taylor in the above-referenced matter. Pursuant to Your Honor's March 13, 2023 Order (ECF No. 52), Plaintiff respectfully requests a pre-motion conference to request permission to file a Motion to Reopen this case and refer the matter back to Magistrate Judge McCarthy. Plaintiff's counsel attempted to comply with Rule 3.A.I. of Your Honor's Individual Rules and meet and confer with Defendant's counsel, but unsurprisingly was unable to reach him by phone call or email.

By way of background, the Parties jointly advised the Court on November 22, 2022 that the matter had settled. (ECF No. 38). The Court endorsed the joint letter on November 30 (ECF No. 39), and advised the parties on December 5 that the deadline to file the settlement agreement or re-open the matter was 45 days, on January 19, 2023. (ECF No. 40). Defendant's counsel did not respond to Plaintiff's repeated requests to finalize the agreement and failed to comply with the Court's deadline. After granting four extensions to Defendant to file the settlement agreement (See ECF Nos. 45, 47, 50, 52), Your Honor advised that "should a settlement not be reached on March 17, [her] remedy is to move to reopen the case." (ECF No. 52).

We thank the Court for its consideration of this matter.

Respectfully submitted,

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cc: All Parties (via ECF)